

# **Exhibit C**

BORDOVSKY - 12/1/21

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

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In re: Chapter 11

BRAZOS ELECTRIC POWER  
COOPERATIVE, INC.

Case No.  
21-30725 (DRJ)

Debtor.

BRAZOS ELECTRIC POWER  
COOPERATIVE, INC.

Plaintiff

v.

Adv. Proc. No.  
21-03863 (DRJ)

ELECTRIC RELIABILITY  
COUNCIL OF TEXAS, INC.

Defendant.  
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\*\*CONTAINS HIGHLY CONFIDENTIAL PORTIONS\*\*

\*\*BOUND SEPARATELY\*\*

PAGES 46-56, 71-72, 86-111

VIDEOTAPED ORAL DEPOSITION OF

KHAKI BORDOVSKY

Waco, Texas

December 1, 2021

Reported by: Susan S. Klinger, RMR-CRR, CSR

Job No. 202444

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2 is either an outside attorney or an expert,  
3 so we won't need to excuse anyone who is  
4 currently on from when we discuss highly  
5 confidential information, Mark; is that  
6 correct?

7 All right.

8 KHAKI BORDOVSKY,  
9 having been first duly sworn, testified as  
10 follows:

11 EXAMINATION

12 BY MR. ALIBHAI:

13 Q. Good morning. Could you please  
14 state your full name.

15 A. My name is Khaki Jane Bordovsky.

16 Q. Ms. Bordovsky -- am I saying that  
17 correct?

18 A. Yes.

19 Q. Ms. Bordovsky, how are you employed?

20 A. I'm employed by Brazos Electric.

21 Q. What is your current position?

22 A. My current position is vice  
23 president of services.

24 Q. How long have you been the vice  
25 president of services?

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2 \* \* \*

3 Q. Let me hand you what has been marked  
4 as Exhibit 30.

5 (Exhibit 30 marked.)

6 Q. This is an email from Mr. Evans to  
7 you and Mr. Karnei and others dated  
8 February 19th; correct?

9 A. That's correct.

10 Q. And it is a summary of collateral  
11 calls from ERCOT; correct?

12 A. It appears to be a summary of  
13 collateral calls from February 16th through  
14 19th.

15 Q. And was the collateral call for  
16 February 18th paid -- sorry -- the collateral  
17 call for February 16th that was due  
18 February 18th paid?

19 A. No, it was not.

20 Q. Was the collateral call for  
21 February 17th that was due February 19th paid?

22 A. No, it was not.

23 Q. Was the collateral call for  
24 February 18th that was due February 22nd paid?

25 A. No, it was not.

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C E R T I F I C A T E

I, SUSAN S. KLINGER, a certified shorthand reporter within and for the State of Texas, do hereby certify:

That KHAKI BORDOVSKY, the witness whose deposition is hereinbefore set forth, was duly sworn by me and that such deposition is a true record of the testimony given by such witness.

I further certify that I am not related to any of the parties to this action by blood or marriage; and that I am in no way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my hand this 2nd of December, 2021.



Susan S. Klinger, RMR-CRR, CSR

Texas CSR# 6531